## |UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

## POST-DISMISSAL MONTHLY FEE STATEMENT COVER SHEET FOR THE PERIOD JUNE 1, 2024 THROUGH JUNE 30, 2024

| Debtor:                                       | LTL Management LLC                       | Applicant    | : Genova Burns LLC          |             |
|---|--|--------------|-----------------------------|-------------|
| Case No.:                                     | 23-12825(MBK)                            | Client:      | Official Comm of Talc Claim | <u>ıant</u> |
| Chapter:                                      | 11                                       | Case Filed   | d: <u>April 4, 2023</u>     |             |
|   | SECTION FEE SUMI                         |              |                             |             |
| X Post-Dis                                    | missal Monthly Fee Statement No. 11      | or           | inal Fee Application        |             |
| Summary of                                    | Amounts Requested for the Period from    | June 1, 2024 | through June 30, 2024       |             |
| (the "Eleven                                  | th Post-Dismissal Statement Period")     |              | -                           |             |
| Total Fees:                                   |  | \$           | 8,865.00*                   |             |
| Total Disbursements:                          |  | \$           | 0.00                        |             |
| Minus 20% holdback of Fees on Appellate work: |  | \$           | 376.50*                     |             |
| Amount Sought at this Time:                   |  | \$           | 4,997.25                    |             |
| 80% of \$1                                    | ,882.50 = \$1,506.00                     |              |                             |             |
| 50% of no                                     | n-appellate work \$6,982.50 = \$3,491.25 |              |                             |             |

| NAME OF PROFESSIONAL<br>& TITLE | YEAR ADMITTED<br>(Or Years Of<br>Professional Service) | HOURS | RATE   | FEE      |
|---------------------------------|--|-------|--------|----------|
| 1. Daniel M. Stolz, Partner     | 1980   | 5.70  | 900.00 | 5,130.00 |
| 2. Donald W. Clarke, Partner    | 2008   | 1.80  | 700.00 | 1,260.00 |
| 3. Susan S. Long, Counsel       | 2007   | 1.20  | 550.00 | 660.00   |
| 4. Lorrie Denson                | Paralegal  | 6.60  | 275.00 | 1,815.00 |

Fee Totals: \$ 8,865.00

Disbursements Totals: \$ 0.00

Total Fee Application \$ 8,865.00

<sup>\*</sup> In the attached statement attached as Exhibit "A", cumulative fees of \$1,882.50 were devoted to appellate work, and the balance in the amount of \$6,982.50 was devoted to necessary, non-appellate administrative tasks performed by Genova Burns. The fees for appellate work are being charged at 100% and shall be paid 80% on a monthly basis, pursuant to agreement with LTL, and the non-appellate work will be paid at the rate of 50%.

## SECTION II SUMMARY OF SERVICES

| SE | RVICES RENDERED   | HOURS | FEE      |
|----|---|-------|----------|
| a) | Asset Analysis and Recovery:  Identification and review of potential assets including causes of action and non-litigation recoveries.   | .10   | 55.00    |
| b) | Asset Disposition Sales, leases, abandonment and related transaction work.  |       |          |
| c) | Avoidance Action Litigation   |       |          |
|    | Preference and fraudulent transfer litigation.  |       |          |
| d) | <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.   |       |          |
| e) | Case Administration  Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquires. | 7.40  | 6,192.50 |
| f) | Claims Administration and Objections  |       |          |
|    | Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.   |       |          |
| g) | Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.   |       |          |
| h) | <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.   | 7.80  | 2,617.50 |
| i) | Fee/Employment Objections Review of an objections to the employment and fee applications of others.   |       |          |
| j) | <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured clams; loan document analysis.  |       |          |
| k) | Litigation  |       |          |
|    | Other than Avoidance Action Litigation (there should be a separate category established for each major matter).   |       |          |
| 1) | <b>Meetings of Creditors</b>  |       |          |
|    | Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.  |       |          |
| m) | Plan and Disclosure Statement   |       |          |
|    | Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.   |       |          |

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|----------------------|--|-------|------------|
| SE                   | RVICES RENDERED  | HOURS | FEE        |
| n)                   | Relief from Stay Proceedings  Matters relating to termination or continuation of automatic stay under 362.   |       |            |
| o)                   | Accounting/Auditing  Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.  |       |            |
| p)                   | Business Analysis  Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.           |       |            |
| q)                   | Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.  |       |            |
| r)                   | Data Analysis  Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc. |       |            |
| s)                   | Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.  |       |            |
| t)                   | Reconstruction Accounting Reconstructing books and records from past transactions and brining accounting current.  |       |            |
| u)                   | <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.   |       |            |
| v)                   | Valuation Appraise or review appraisals of assets.   |       |            |
| w)                   | Travel Time  |       |            |
| SE                   | RVICE TOTALS:  | 15.30 | \$8,865.00 |

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## SECTION III SUMMARY OF DISBURSEMENTS

| DIS | DISBURSEMENTS AMOUNT  |        |  |
|-----|---|--------|--|
| a)  | Filing Fees Payable to Clerk of Court.  |        |  |
| b)  | Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. |        |  |
| c)  | Pacer Fees Payable to the Pacer Service Center for search and/or print.                 |        |  |
| d)  | Fax Include per page fee charged.   |        |  |
| e)  | Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.          |        |  |
| f)  | In-house Reproduction Services Exclusive of overhead charges.                           |        |  |
| g)  | Outside Reproduction Services Including scanning services.                              |        |  |
| h)  | Other Research Title searches, UCC searches, Asset searches, Accurint.                  |        |  |
| i)  | Court Reporting Transcripts.  |        |  |
| j)  | Travel Mileage, tolls, airfare, parking.  |        |  |
| k)  | Courier & Express Carriers Overnight and personal delivery.                             |        |  |
| 1)  | Postage   |        |  |
| m)  | Other (specify) Litigation Support Vendors  |        |  |
| DIS | BURSEMENTS TOTAL:   | \$0.00 |  |

I certify under penalty of perjury that the above is true.

Date: July 17, 2024

/s/ Daniel M. Stolz

DANIEL M. STOLZ